UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
V.) CRIMINAL NO. 1:23-cr-10216- DJC
JENNIFER FORTIER,)
Defendant	_)

DEFENDANT'S EMERGENCY MOTION TO MODIFY CONDITIONS OF RELEASE

Now comes the Defendant, *Jennifer Fortier ("Jen")*, with the assent of the Government and Probation and moves this Honorable Court to modify her conditions of release to allow her to leave Connecticut on April 30, 2025 after 8:00 a.m. and travel to the Worcester area and return to Connecticut no later than 6:00 p.m. on April 30, 2025.

As reasons therefore, the Defendant was sentenced by this Honorable Court on March 27, 2025. After sentence was imposed, the Defendant was given a report date on May 8, 2025. The Defendant was to remain on the conditions of release imposed at the outset of the case. Among the conditions of release was to allow travel to the District of Massachusetts *for court*.

The Defendant is seeking to transfer custody of her dog to her sister prior to reporting to BOP. The Defendant's sister lives in New Hampshire. The Defendant originally had planned to ask for permission to go to New Hampshire to transfer the dog. The Defendant agreed with her sister to meet half-way between Connecticut and New Hampshire for convenience of both parties. The Defendant also is asking for

permission to stay in the Worcester area to have lunch with her father and sister before reporting to BOP.

Counsel has spoken with Probation and AUSA Hassink and they both assent to the modification outlined above.

WHEREFORE, the Defendant respectfully requests this Honorable Court GRANT her motion.

DATE: April 29, 2025

Respectfully Submitted Jennifer Fortier By her attorney,

/s/ Jeffrey Miller Jeffrey Miller, Esq. 529 Main St.., Ste. 200 Boston, MA 02129 BBO # 670561 (857) 919-3647 jmiller@millercriminaldefense.com

CERTIFICATE OF SERVICE

I, Jeffrey Miller, hereby certify that this document, filed through the ECF System, will be electronically sent to the registered participants as identified on the Notice of Electronic Filing (NEF), and that papers will be sent to all non-registered participants who have appeared in this case on April 29, 2025.

<u>/s/ Jeffrey Miller</u> Jeffrey Miller